

Bell Aerospace **TEXTRON**

Bell Aerospace Textron
Division of Textron Inc.

Post Office Box One
Buffalo, New York 14240-0001
716/297-1000

6 April 1988

Ms. Sherrel D. Henry
U.S. Environmental Protection Agency -- Region II
Site Compliance Branch
26 Federal Plaza
Room 747
New York, NY 10278

RE: York Oil, Moira, NY
Preliminary response to Request for Information

Dear Ms. Henry:

Please consider this to be a preliminary response to Mr. Stephen D. Luftig's March 18, 1988 letter to Mr. Beverly F. Dolan of Textron Inc. We are pleased to advise the following per your Request for Information:

1. a) Bell Aerospace Textron, a division of Textron Inc.
b) President of Bell Aerospace, effective 4-11-88:
John W. Siedlecki

Mr. Siedlecki is a new employee of Bell Aerospace and as of yet, does not have a resident address in the Buffalo area. His corporate address is:
Bell Aerospace Textron
PO Box One
Buffalo, NY 14240-0001

In the interim, the Acting President is:
Paul J. Michaud, Vice President - Finance

FOIA EX. 6

- c) Textron Inc. is incorporated in the State of Delaware. CT Corporation is its agent for service of process in the states of Delaware and New York.
- d) Bell Aerospace is an operating division of Textron Inc. Textron Inc.'s Chairman of the Board and Chief Financial Officer is Mr. Beverly Dolan, Textron Inc., PO Box 878, Providence, RI 02901
- e) See answer 1 c)

2. Textron Inc. first leased its Wheatfield NY offices from Bell Aircraft Corporation on July 1, 1960 as part of a purchase of certain business operations pursuant to a Purchase Agreement dated 4-13-60. The property was then purchased by Textron Inc. on June 26, 1973 from Petrol Stations, Inc.
Engineering Systems for Tomorrow

Sherrel D. Henry
April 6, 1988
Page Two

3. Bell Aerospace objects to the scope and breadth of this question; but, without waiving its objection, Bell will endeavor to respond. However, additional time is required to provide the requested information for this extended time period. Bell will undertake to try to provide such information as soon as possible, and transmit same immediately to the extent it is available.

4. See answer 3.

5. See answer 3.

6. Bell Aerospace has previously reviewed materials in its procurement, accounts payable, safety and environment, maintenance supervision departments to determine if and where any records of waste oils and lubricants removed by the parties named in this request for information #6 are located. We have no record in our procurement department of any purchase orders being placed with any of the named parties from 1969-forward and the individuals contacted do not have any present recollection of any contact with the individuals or companies named. In most cases, our records do not go back to 1950. This answer will be supplemented as soon as additional information becomes available.

7. See answer 6.

8. No request for information submitted was identified as #8.

9. See answer 6.

10. See answer 6.

11. See answer 6.

12. On 4-13-60 Bell Aircraft Corporation and other entities sold to Textron certain defense businesses and assets. As part of the 4-13-60 transaction, Textron did not assume liability for any environmentally related matters. Upon information and belief, Bell Aircraft Corporation continued in existence and eventually became part of Allied/Signal Corporation.

13. Textron's policy does not permit disclosure of insurance coverage. I can inform you, however, that for much of the period in question, Textron has extensive comprehensive general liability coverage which may apply to this site. Textron is currently in litigation with its various insurance carriers concerning the scope and extent of such coverage. In any event, as you can see from the enclosed Annual Report, Textron has sufficient assets to cover any potential liability.

14. Textron's 1987 Annual Report is enclosed.

Sherrel D. Henry
April 6, 1988
Page Three

Bell Aerospace has made a good faith effort to provide this preliminary response; however, the scope of the questions, period of time covered and seriousness of the matter require a more in-depth investigation. The company formally requests an additional thirty days to complete its investigation and supplement these answers, if such information should become available.

Bell Aerospace also formally requests the EPA provide Bell copies of all responses and information that link Bell to this site. When originally contacted by the Aluminum Company of America regarding this matter, Bell was led to believe its only involvement was through a Mr. Lee Nickerson who drove a collection truck and managed a storage facility in Central Square, New York. Bell requested a copy of Mr. Nickerson's statement in March 1986 but has not yet received it.

If you have any questions regarding the above, please contact Carl G. Buzawa, Vice President - Division Counsel at (716) 696-6748.

Sincerely,



Paul J. Michaud
Vice President - Finance

cc: Elena Kissel
Office of Regional Counsel
US. Environmental Protection Agency - Region II
26 Federal Plaza
Room 437
New York, NY 10278

Textron 87